

MEMORANDUM

City of Springfield, Oregon

To: Mayor and Councilors
From: Amy Sowa, City Recorder
Date: September 1, 2016
Subject: Correspondence Regarding the Congestion Mitigation and Air Quality (CMAQ) Funds

Attached is correspondence submitted to the Oregon Transportation Commission during their hearing in Klamath Falls on Friday, August 19. Mayor Lundberg attended and had a brief opportunity to testify during the hearing.

The attached letters are from the following:

- Metropolitan Police Committee Members (Eugene Councilor Zelenka, Lane County Commissioner Pat Farr, Eugene Mayor Kitty Piercy, Springfield Mayor Christine Lundberg, Coburg Councilor Jerry Behney, and Lane Transit District Board President Gary Wildish)
- Paul Thompson, Manager, Central Lane Metropolitan Planning Organization
- Steve Mokrohisky, Lane County Administrator
- Kitty Piercy, Eugene Mayor
- Christine Lundberg, Springfield Mayor
- Ray Smith, Coburg Mayor and Jerry Behney, Coburg Councilor
- Gary Wildish, LTD Board President



August 19, 2016

Tammy Baney, Chair
Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301-3871

Dear Commissioner Baney,

The Central Lane Metropolitan Policy Committee (MPC), acting as the Central Lane Metropolitan Planning Organization (MPO) Policy Board, respectfully requests the OTC direct ODOT to make an immediate determination as to when we can expect to receive the federal Congestion Mitigation and Air Quality (CMAQ) funding due to this MPO since (at least) 2013, that ODOT permit the MPO to fully participate in all future CMAQ funding and processes beginning immediately, and that ODOT correct the federal Public Lands (or PL) operational funding to reflect our CMAQ eligibility.

The Central Lane MPO Policy Board, the Metropolitan Policy Committee for the Eugene, Springfield, and Coburg metropolitan area, brings this concern to you today because funding that should have been allocated to the MPO starting in at least 2013 has not been allocated, and ODOT is recommending to not allocate funding to the Central Lane MPO until at least 2019.

It is unacceptable that the Central Lane MPO (and the Salem-Keizer MPO) should not receive any funds for which we have been eligible for at least six years – while the other CMAQ-eligible areas in the state continue to make use of what, under the current CMAQ allocation formula, is Central Lane's (and Salem-Keizer's) funding. You will hear from the other CMAQ areas that you should not reduce the level of their funding, when, in fact, "their funding" has been inflated for many years by the inclusion of Central Lane's (and Salem-Keizer's) funding in their allocations.

On April 19, 2016, McGregor Lynde of ODOT wrote to all CMAQ stakeholders, including "an example of what the allocations could look like, when Salem and Eugene are added. . . . this does give you a sense of what the impact to your area could be." That example showed that, under the current allocation formula, the Central Lane MPO should be receiving approximately \$2.25 million per year in CMAQ funding. The same April 2016 communication told the existing CMAQ funding recipients that "[ODOT] would strongly recommend taking a conservative approach as you do your project solicitation/selection efforts [for future CMAQ funding]," presumably recognizing that some of the existing funding is supposed to be allocated to the Central Lane and Salem-Keizer MPOs now. Furthermore, although ODOT has stated that "In March 2016 . . . FHWA . . . confirmed that both the Salem and Eugene areas are now eligible CMAQ areas" (emphasis added), in fact the determination by the Federal Highway Administration stated that the Central Lane area "became eligible in June 2013."

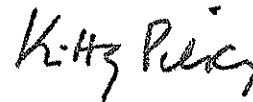
For at least the past four years, the Central Lane MPO has asked ODOT to include the MPO in the CMAQ program. The MPO has contacted ODOT's (former) CMAQ manager, our local ODOT Area Manager, and other ODOT staff with this request multiple times, and in most instances has either never received a response, or has simply received a response stating (erroneously) that the Central Lane MPO is not eligible for CMAQ funding. The MPO knew it was eligible, but it could not convince ODOT of that, or even, until very recently, obtain assistance from ODOT (as the entity responsible for CMAQ funds in the state) to review the question with the FHWA.


Additionally, CMAQ eligibility does not only affect the receipt of CMAQ funds – for Oregon's MPOs it also affects the amount of federal Public Lands (or PL) operational funding that the MPOs receive. At the conclusion of the lengthy 2014-2015 process to update the PL funding formula, ODOT staff wrote that the Central Lane MPO "informed the group that CLMPO would be seeking approval for CMAQ funds soon. However, as this has not been formally approved, ODOT has not modified the complexity factors for CLMPO around the AQ CMAQ complexity factor. If at a future date, CLMPO becomes a designated AQ CMAQ eligible MPO, that factor can be modified at that time" (emphasis added). Almost immediately after the March 8, 2016 FHWA determination that the Central Lane MPO has been eligible since 2013, the MPO requested an adjustment to the PL funding proposed for FY17. This request was made prior to the OTC's approval of that FY17 PL funding. ODOT's response was "no" – that the CMAQ factor would be adjusted "the next time the PL formula is revisited." As a result, the Central Lane MPO has received approximately \$15,000 less in FY17 PL funding than it should have, and will continue to receive less in future fiscal years until this is corrected.


Again, the Metropolitan Policy Committee, acting as the Central Lane MPO Policy Board, respectfully requests that the OTC direct ODOT to make the Central Lane MPO whole for lost CMAQ funding back to at least 2013, that ODOT revise future CMAQ funding and processes immediately, and that the PL funding be updated immediately to reflect the MPO (and Salem's) eligibility for CMAQ funding. The MPO is prepared to fund multiple projects with CMAQ funding that will benefit both air quality and congestion in the region.


Alan Zelenka, Chair
Metropolitan Policy Committee
Councilor, City of Eugene



Pat Farr, Member
Metropolitan Policy Committee
Commissioner, Lane County


Kitty Piercy, Member
Metropolitan Policy Committee
Mayor, City of Eugene

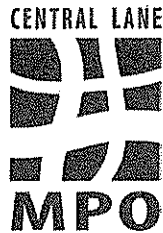

Christine Lundberg, Member
Metropolitan Policy Committee
Mayor, City of Springfield


Jerry Beiney, Member
Metropolitan Policy Committee
Counselor, City of Coburg


Gary Wildish, Member
Metropolitan Policy Committee
President, Lane Transit District Board of Directors


Brendalee Wilson, Executive Director
Central Lane MPO, Lane Council of Governments

Cc: Congressman Peter DeFazio, Oregon's 4th District
Lee Beyer, Senator, Oregon Senate District 6
Floyd Prozanski, Senator, Oregon Senate District 4
Chris Edwards, Senator, Oregon Senate District 7
Nancy Nathanson, Representative, Oregon House District 13
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City Council, City of Coburg
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Board of Commissioners, Lane County
Board of Directors, Lane Transit District
Board of Directors, Lane Regional Air Protection Agency



August 19, 2016

Tammy Baney, Chair
Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301-3871

Dear Commissioner Baney,

The Central Lane Metropolitan Planning Organization (MPO) respectfully requests that the OTC direct ODOT to make an immediate determination as to when we can expect to receive the federal Congestion Mitigation and Air Quality (CMAQ) funding due to it since (at least) 2013, that ODOT permit the MPO to fully participate in all future CMAQ funding and processes beginning immediately, and that ODOT correct the federal Public Lands (or PL) operational funding to reflect our CMAQ eligibility.

The Central Lane MPO has firmly believed for a number of years that the Central Lane area has been eligible to receive CMAQ funds, and has pursued this with ODOT over those years with little result until recently. In March 2016, the Federal Highway Administration (FHWA) determined that both the Eugene and Salem areas "became eligible in June 2013" to receive CMAQ funding.

The FHWA determination was based on the current set of CMAQ rules, which were put in place around June 2013, thus the timing of eligibility was set at that point. The MPO believes that the Central Lane area became CMAQ-eligible much earlier than 2013, based on its PM_{10} nonattainment status that dates from 1987.

The Central Lane Area is CMAQ-eligible due to ongoing air quality concerns in the region, and our current status as a PM_{10} maintenance area (course Particulate Matter) through June, 2033. In the Central Lane region, although particulate levels have been in compliance, the region was within 10 percent of violating the current 24-hour $PM_{2.5}$ standard during 2013-2015. This is significant – it places the region at levels of concern with respect to particulate air quality.

In addition, the monitored level of ozone in the Central Lane region reversed its decline and began trending upward toward the standard in 2015. The 2015 Lane Regional Air Protection Agency (LRAPA) report shows the area's ozone design level at 0.060 ppm compared with the standard of 0.070 ppm. Furthermore, the maximum daily 8 hour average for 2015 reached 0.080 ppm – it was only because the prior two years were less than 0.060 ppm that allowed the required measurement (the 3 year average of the 4th highest maximum daily 8 –hour measurement) to not *exceed* the standard. The ozone issue in the region is almost certainly transportation related, and with growth and vehicle miles travelled (VMT) expected to rise, attention to ozone pollution is needed in the Central Lane region.

CMAQ funding would allow the region to get a precise handle on the sources of the pollution, identify problem areas, and implement projects to address these problems, such as projects to address bus and heavy diesel exhaust from garbage trucks, gravel trucks, etc. Encouraging removal of old diesels from the roads, and transitions to electric or natural gas would be a very cost-effective use of CMAQ funds and would benefit the entire air shed.

The Oregon Transportation Commission will hear from other metropolitan areas in the state that are already receiving CMAQ funds with their own claims of their need for CMAQ funds to address air quality issues in their regions, and that “diverting” any of those funds to the Central Lane or Salem regions would harm their efforts. But, the true fact is that Central Lane and Salem CMAQ funds have been diverted to the other CMAQ areas for at least four years, and ODOT is proposing to continue doing so for at least another two years.

The Rogue Valley MPO has already claimed that there is no “indication that the need in the Salem and Eugene Air Quality areas is sufficient to potentially compromise the viability of existing programs.” They further claim that “air quality in Medford and Grants Pass is generally closer to a violation of the [standards] for CO and PM_{10} (sic) than in either Eugene or Salem . . . [and] Medford is [close] to being in violation of the standards for $PM_{2.5}$ and . . . for ozone.” These claims are simply not true, or over-stated:

- CO is not an important pollutant any more in any area in Oregon. Medford’s own figures show that all three areas (Medford, Eugene, Salem) are *well* below the CO standard, even if Medford is slightly higher than either Eugene or Salem. The U.S. Environmental Protection Agency has recognized this and has stopped funding CO monitors in Oregon except for several in the Portland area which are being used as a reference. Funding a project that is targeted at CO reduction seems to us to be a waste of CMAQ funds which could be spent addressing more significant air quality concerns.
- Similarly, PM_{10} is not as significant of an air quality issue in Oregon as it used to be. In fact, however, Medford’s own graph shows that E-S has generally higher levels of PM_{10} than Medford/Grants Pass. As with CO, the levels are generally below 40% of the standard, and the EPA recognizes that it is very unlikely that a violation will occur when levels have reached that point. It is the $PM_{2.5}$ component within the PM_{10} overall measure that is the most important.
- The Central Lane area has actually had more daily exceedances of the $PM_{2.5}$ standard over the past several years than has Medford. And while the three year average that actually determines a violation has not been exceeded by Medford, Grants Pass, Central Lane, or Salem, Grants Pass and Salem have been furthest from a violation, while Central Lane and Medford have been closest.
- The Central Lane air shed, at the southern end of the Willamette Valley, not only is subject to significant stagnation and winter-time air quality inversions, but is also located downwind of the northern large urban areas from which the pre-cursors to ozone creation occur. Ozone is a pollutant that is created from pre-cursors that are generally created upwind and are combined under certain conditions in an area to form ozone. There have been 11 exceedances of the 8 hour Ozone standard since 2006 in the Eugene area.

Perhaps most significantly, the Rogue Valley analysis completely ignores the fact that the Central Lane population is more than twice that of the combined population of Medford and Grants Pass. There is a very good reason that many, if not most, of the CMAQ fund allocations in the nation are at least partially based on population – you

want to address the areas of air quality concern *that affect the most people*. While, at a very high level, Central Lane's and Rogue Valley's air quality issues may appear to be similar, Central Lane's affect many more people.

Also of great significance to both the Central Lane and Salem MPOs is the fact that newly released MAP-21/FAST Act System Performance Measures include two new measures for CMAQ areas. As a result, all Oregon MPOs that are CMAQ-eligible are now required to develop, monitor, and work toward performance measures addressing CMAQ goals. Withholding CMAQ funds from Central Lane and Salem would jeopardize the ability to do this, and unfairly penalize them.

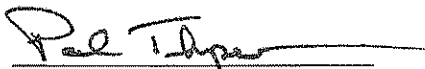
Finally, it should be noted that one of the original intents of CMAQ funding when it was initiated in the 1980s was to assist areas currently subject to federal air quality plans in addressing their air quality issues. One significant change to the CMAQ rules in 2013 is illustrated by this exchange between ODOT and FHWA:

ODOT question: For areas like Portland—that are reaching the end of their second maintenance plan—what factors or criteria must come into effect for them to be removed from CMAQ eligibility? How much lead-time will ODOT and local jurisdictions have if they are reaching the end of their CMAQ eligibility?

FHWA response: Portland will continue to be eligible for CMAQ funds per 23 USC 149(b), “the area is or was designated as a nonattainment area for ozone, carbon monoxide, or particulate matter...” (emphasis added)

The key here is the inclusion of the word “was” in the new rules. At least partly a political maneuver nationally to ensure that CMAQ areas that were nearing the end of their 20-year maintenance plan could continue to receive CMAQ funding, the inclusion of the word “was” in the new rules ensures that Portland will continue to be eligible to receive CMAQ funds even though, as of October 2017, it will no longer be subject to a federal air quality maintenance plan. In contrast, the Central Lane MPO is subject to a federal air quality PM₁₀ maintenance plan through at least June, 2033.

The Central Lane MPO respectfully requests that the Oregon Transportation Commission immediately direct ODOT to include the Central Lane MPO in all CMAQ funding distributions, and to provide the MPO with the funding it should have received since at least 2013.



Paul Thompson, Manager
Central Lane Metropolitan Planning Organization

Cc: Congressman Peter DeFazio, Oregon's 4th District
Lee Beyer, Senator, Oregon Senate District 6
Floyd Prozanski, Senator, Oregon Senate District 4
Chris Edwards, Senator, Oregon Senate District 7
Nancy Nathanson, Representative, Oregon House District 13
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City Council, City of Coburg
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City Council, City of Springfield
Board of Commissioners, Lane County
Board of Directors, Lane Transit District
Board of Directors, Lane Regional Air Protection Agency



LANE COUNTY ADMINISTRATION

PUBLIC SERVICE BUILDING / 125 EAST 8TH AVENUE / EUGENE, OR 97401 / (541) 682-4203 / FAX (541) 682-4616

August 17, 2016

Tammy Baney, Chair
Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301-3871

Dear Commissioner Baney,

On behalf of Lane County, I would like to respectfully request that the OTC and ODOT reevaluate the eligibility of Central Lane Metropolitan Planning Organization (MPO) to receive federal Congestion Mitigation and Air Quality (CMAQ) funds dating back to 2013. As a member of the Central Lane MPO Policy Board, Lane County shares the concern with our other MPO partner agencies that CMAQ funding has not been provided to our area despite meeting eligibility requirements since at least 2013.

Similar to other communities throughout Oregon, Lane County and the cities within are in dire need of additional transportation funding. Past revenue sources for transportation improvements are no longer adequate for the tremendous need to maintain and preserve the existing system, let alone to reduce congestion on our roads and bridges. Local communities have tried to pass individual funding measures often to little or no avail.

Lane County has a wealth of natural resources, including timber, which historically funded much of our transportation system. As timber revenues decreased dramatically over the years, many communities throughout Lane County saw dramatic decreases in funding levels for transportation improvements. For example, in recent years, the Lane County Capital Improvement Program (CIP) has gone from a high of \$107 million in Road Fund expenditures in the 2005-2009 CIP to \$15 million in Road Fund expenditures in its current CIP. That equates to a mere \$3 million per year for over 1,400 miles of roadway and 417 bridges. The economy of Lane County depends on a safe, well-functioning transportation system. Communities in our area rely on a multi-modal system that includes safe and convenient access to local businesses and recreation areas for people who walk, bike, ride transit or drive. Our freight routes are critical to the long-term sustainable growth of our communities. We believe that CMAQ funding is a critical funding source for the Central Lane MPO area to help reduce overall congestion on our roads and bridges.

Lane County greatly appreciates your reconsideration of Central Lane MPO's eligibility to receive federal Congestion Mitigation and Air Quality (CMAQ) funds. Thank you again.

Sincerely,

Steve Mokrohisky
Lane County Administrator



Mayor's Office
Kitty Piercy

August 16, 2016

Tammy Baney, Chair
Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301-3871

Dear Commissioner Baney,

The City of Eugene, a member of the Central Lane Metropolitan Policy Committee, respectfully request that the Oregon Transportation Commission (OTC) take action regarding Oregon's federal Congestion Mitigation and Air Quality (CMAQ) program. As you are aware, the Federal Highway Administration (FHWA) has issued a finding that the Central Lane and Salem-Keizer metropolitan areas have been qualified to receive CMAQ funding since 2013, but have not received any such funding.

In 2014, the Eugene City Council adopted a Climate Recovery Ordinance that commits our community to aggressively lowering community-wide greenhouse gas emissions and fossil fuels used for motor vehicles. Projects and programs that will reduce carbon emissions also reduce the air pollutants targeted by the CMAQ program. And we are ready to take action; CMAQ funds can be utilized by our City's Transportation Options program or supporting Lane Transit District efforts to provide better service that gives more people an alternative to driving.

As the center of Oregon's second largest metropolitan area, Eugene will efficiently use CMAQ funds to significantly improve air quality. As the Legislature's Joint Committee on Transportation Preservation and Modernization recently heard, our metro area focus is on creating a true multi-modal regional transportation system, one that will offer choices for all users, and create significant improvements in congestion and air quality.

Please direct ODOT to reconcile past funding errors and to fix the CMAQ processes for current and future funding opportunities.

Sincerely,

Kitty Piercy
Mayor

CITY OF SPRINGFIELD

OFFICE OF THE MAYOR AND CITY COUNCIL



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August 16, 2016

Tammy Baney, Chair
Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301-3871

Dear Commissioner Baney,

On behalf of the City of Springfield, I respectfully request the OTC direct ODOT to make an immediate determination as to when the Central Lane MPO can expect to receive the federal Congestion Mitigation and Air Quality (CMAQ) funding they have been due to receive since at least 2013, that ODOT permit the MPO to fully participate in all future CMAQ funding and processes beginning immediately, and that ODOT correct the federal Public Lands (or PL) operational funding to reflect their CMAQ eligibility.

ODOT is recommending to not allocate CMAQ funds to the Central Lane MPO and the Salem-Keizer Area Transportation Study (SKATS) MPO until at least 2019. This is unacceptable, as the funds should have been allocated to the MPO starting in at least 2013. Since 2013, the other CMAQ-eligible areas in the state continue to make use of what, under the current CMAQ allocation formula, should have been allocated to Central Lane and Salem-Keizer. Because the funds were not distributed to the Central Lane MPO and Salem-Keizer Area Transportation Study (SKATS) MPO as they should have, the other CMAQ areas have experienced an inflated level of funding over those years.

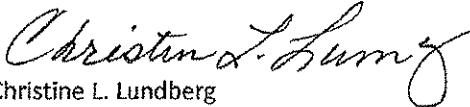
On April 19, 2016, McGregor Lynde of ODOT wrote to all CMAQ stakeholders, including "an example of what the allocations could look like, when Salem and Eugene are added. . . . this does give you a sense of what the impact to your area could be." That example showed that, under the current allocation formula, the Central Lane MPO should be receiving approximately \$2.25 million per year in CMAQ funding. The same April 2016 communication told the existing CMAQ funding recipients that "[ODOT] would strongly recommend taking a conservative approach as you do your project solicitation/selection efforts [for future CMAQ funding]," presumably recognizing that some of the existing funding is supposed to be allocated to the Central Lane and Salem-Keizer MPOs now. Furthermore, although ODOT has stated that "In March 2016 . . . FHWA . . . confirmed that both the Salem and Eugene areas are now eligible CMAQ areas" (emphasis added), in fact the determination by the Federal Highway Administration stated that the Central Lane area "became eligible in June 2013."

For at least the past four years, the Central Lane MPO has asked ODOT to include the MPO in the CMAQ program. The MPO has contacted ODOT's (former) CMAQ manager, our local ODOT Area Manager, and other ODOT staff with this request multiple times, and was told that the Central Lane MPO was not eligible for CMAQ funding. The MPO could not convince ODOT that it was eligible, and only recently obtained assistance from ODOT to review the question with the FHWA.

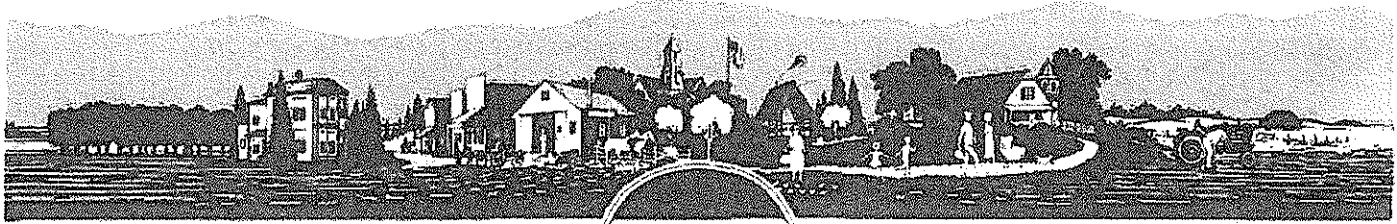
CMAQ eligibility does not only affect the receipt of CMAQ funds – for Oregon's MPOs it also affects the amount of federal Public Lands (or PL) operational funding that the MPOs receive. Almost immediately after the March 8, 2016 FHWA determination that the Central Lane MPO has been eligible since 2013, the MPO requested an adjustment to the PL funding proposed for FY17. This request was made prior to the OTC's approval of that FY17 PL funding. ODOT's response was "no" – that the CMAQ factor would be adjusted "the next time the PL formula is revisited." As a result, the Central Lane MPO has received approximately \$15,000 less in FY17 PL funding than it should have, and will continue to receive less in future fiscal years until this is corrected.

Again, on behalf of the City of Springfield, I respectfully request that the OTC direct ODOT to make the Central Lane MPO whole for lost CMAQ funding back to at least 2013, that ODOT revise future CMAQ funding and processes immediately, and that the PL funding be updated immediately to reflect the MPO (and Salem's) eligibility for CMAQ funding. The MPO is prepared to fund multiple projects with CMAQ funding that will benefit both air quality and congestion in the region.

Sincerely,


Christine L. Lundberg
Mayor

Cc: Congressman Peter DeFazio, Oregon's 4th District
Lee Beyer, Senator, Oregon Senate District 6
Floyd Prozanski, Senator, Oregon Senate District 4
Chris Edwards, Senator, Oregon Senate District 7
Nancy Nathanson, Representative, Oregon House District 13
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Board of Commissioners, Lane County
Board of Directors, Lane Transit District
Board of Directors, Lane Regional Air Protection Agency



CITY OF COBURG • P.O. BOX 8316 • COBURG

OREGON 97408 • 541-682-7850 FAX 541-485-0655

August 15, 2016

Tammy Baney, Chair
Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301-3871

Dear Commissioner Baney,

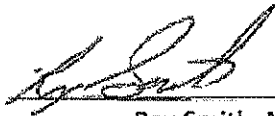
The City of Coburg, a member of the Central Lane MPC, acting as the Central Lane MPO Policy Board, respectfully requests the Oregon Transportation Commission direct ODOT to make whole our federal Congestion Mitigation and Air Quality (CMAQ) funds that MPO has diligently researched and advocated for over many years on our behalf. At long last, it has been found that since - at least - 2013 (arguably 1987), our region has been eligible. We ask that ODOT retroactively correct the operational funding to reflect our CMAQ eligibility. Further, the process to address this issue has not been communicated directly to us. We ask that ODOT allow us to be actively involved in solving our problem.

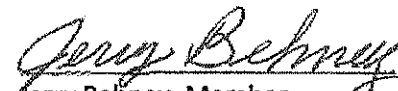
We have been following closely over the past four years while the Central Lane MPO has asked ODOT to include the MPO in the CMAQ program and to assist in arriving at a final, correct, determination of our eligibility. The MPO has contacted ODOT's CMAQ managers, our local ODOT Area Manager, and other ODOT staff with this request multiple times, and in most instances has either never received a response, or has simply received a response stating (erroneously) that the Central Lane MPO is not eligible for CMAQ funding. The MPO knew it was eligible, but it could not convince ODOT of that or obtain assistance from ODOT to review the question with FHWA.

There have been many opportunity costs of the forgone funding which have had real consequences to our small community. These funds could make positive impacts on the region as Coburg is the location of a major travel center; truck stop; fueling stations; and cross dock station; FedEx transfer station; RV parks; and motor coach and other light manufacturing of heavy equipment. CMAQ will help us with our heavy diesel particulate and other greenhouse gas mitigation efforts.

Again, the City of Coburg respectfully requests that the OTC direct ODOT to make the Central Lane MPO whole for lost CMAQ funding and that ODOT fix future CMAQ funding and processes immediately.

Regards,


Ray Smith, Member
Metropolitan Policy Committee
Mayor, City of Coburg


Jerry Behney, Member
Metropolitan Policy Committee
Councilor, City of Coburg

Cc: Congressman Peter DeFazio, Oregon's 4th District
Lee Beyer, Senator, Oregon Senate District 6
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August 17, 2016

The Honorable Tammy Baney, Chair
Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301-3871

Dear Ms. Baney:

This letter is in regards to the Oregon Transportation Commission's forthcoming discussion of the distribution of federal Congestion Mitigation and Air Quality (CMAQ) funding. As you may be aware, the Federal Highway Administration (FHWA) has issued a finding that the Central Lane and Salem-Keizer metropolitan areas have been qualified to receive CMAQ funding since 2013, but they have not received this funding.

Despite FHWA's finding, Oregon Department of Transportation (ODOT) Director Matthew Garrett recommends continuing the current CMAQ distribution formula, which redistributes the funding authorized for to the Central Lane Metropolitan Planning Organization (MPO) to other parts of the state, until at least 2019.

Our community faces serious air quality concerns and should be provided with all available resources to combat air pollution. Despite limited funding, Lane Transit District (LTD) has invested heavily in measures to reduce pollution. LTD is in the second year of a three-year, \$3 million investment in transit operations that will result in a nearly 10 percent increase in transit hours of service. We are also modernizing our fleet to reduce emissions, adding 10 zero-emission buses to accompany 54 diesel-hybrid buses in our 109-vehicle fleet.

Efforts to reduce air pollution are not limited to LTD. The regionally funded Point2point Transportation Options program is a successful initiative designed to increase the use of alternative transportation. In July alone, the Point2point program recorded more than 1,400 carpool trips, for a total of nearly 21,000 carpooled miles; and the vanpool program reduced vehicle miles traveled by more than 167,000 miles, eliminating more than 100,000 pounds of carbon dioxide emissions in the process.

All of this is a long way of saying that investing in air quality efforts through the Central Lane MPO is a smart investment. We know how to use limited resources to make large gains. With all due respect, LTD requests that the OTC instruct ODOT to properly allocate CMAQ funding to our region, and to make the region whole from lost revenue dating to 2013 when the MPO was eligible to receive funding. We also request that any future discussion of CMAQ distribution be an open and inclusive process that involves all governing bodies who qualify for funding.

Thank you for your consideration and leadership. If you have any questions, please contact Paul Thompson at Lane Council of Governments at 541-682-4405.

Sincerely,

A handwritten signature in cursive script, reading 'Gary Wildish'.

Gary Wildish, President
Lane Transit District Board of Directors

GW:EM:jms